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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

NAKIA V. PORTER, an individual on her own behalf and on behalf of her minor children, L.P. and A.P.; JOE BERRY POWELL, JR., an individual; and CLIFTON POWELL, on behalf of his minor child, O.P.,

Plaintiffs.

V.

COUNTY OF SOLANO; SOLANO COUNTY SHERIFF'S OFFICE; SHERIFF THOMAS A. FERRARA, in his official capacity as Sheriff of Solano County; DEPUTY DALTON MCCAMPBELL, an individual; DEPUTY LISA MCDOWELL, an individual; SERGEANT ROY STOCKTON, an individual; DEPUTY CONNOR HAMILTON, an individual; DEPUTY CHRIS CARTER, an individual; CITY OF DIXON; DIXON POLICE DEPARTMENT; DIXON POLICE CHIEF ROBERT THOMPSON, in his official capacity as Dixon Chief of Police; OFFICER GABRIEL HOLLINGSHEAD, an individual, OFFICER AARON WILLIAMS, an individual, and DOES 1 to 10, inclusive.

Defendants.

Case No. 2:21-CV-01473-KJM-JDP

**PLAINTIFFS' NOTICE OF LODGING
ELECTRONIC EXHIBITS IN SUPPORT OF
MOTION FOR SANCTIONS FOR
SPOILATION OF EVIDENCE (L.R. 138(l))**

Hon. Kimberly J. Mueller
United States District Judge

Hearing Information:

Date: July 12, 2024
Time: 10:00 a.m.
Judge: Hon. Kimberly J. Mueller
Courtroom: 3, 15th Floor

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD**

2 **PLEASE TAKE NOTICE THAT** that pursuant to Local Rule 138(l), Plaintiffs Nakia V. Porter,
3 on behalf of herself and her two daughters, L.P. and A.P., Joe Berry Powell, Jr., and Clifton Powell, on
4 behalf of his daughter, O.P. (collectively, “Plaintiffs”), by and through their undersigned counsel of
5 record, hereby lodge the following electronic exhibits with the Court:

6 1. Exhibit 3 to the Declaration of Yasin Almadani in Support of Motion for Sanctions for
7 Spoliation of Evidence (“Almadani Declaration”), which is a true and correct copy of relevant excerpts
8 from the body camera video footage from the body-worn camera of Solano Sheriff’s Deputy Dalton
9 McCampbell on the night of August 6, 2020, relating to the incident at issue in this lawsuit.

10 2. Exhibit 4 to the Almadani Declaration, which is a true and correct copy of relevant
11 excerpts of body camera video footage from the body-worn camera of Solano Sheriff’s Sergeant Roy
12 Stockton on the night of August 6, 2020, relating to the incident at issue in this lawsuit.

13 3. Exhibits 9-1, 9-2, 9-3, 9-4, 9-5, and 9-6 to the Declaration of Yasin Almadani, which are
14 true and correct copies of videos prepared of forensic video and audio expert Jason Fries’ forensic
15 analysis of body camera and dash camera videos produced by Defendants this case.

16 4. Exhibit 12 to the Declaration of Yasin Almadani, which is a true and correct copy of the
17 Rule 26 Expert Report of Professor Peter Simi, Ph.D., Plaintiffs’ expert on extremism and white
18 supremacist movements.

19 The aforementioned exhibits will be delivered to the Court via a USB flash drive.

20 Dated: May 16, 2024

ALMADANI LAW

21 /s/ Yasin M. Almadani

22 Yasin M. Almadani, Esq.

23 AI LAW, PLC

24 /s/ Ahmed Ibrahim

25 Ahmed Ibrahim, Esq.

26 *Attorneys for Plaintiffs*